1 2	ERIC W. SWANIS, ESQ. Nevada Bar No. 6840 GREENBERG TRAURIG, LLP 10845 Griffith Peak Drive, Suite 600		
3	Las Vegas, Nevada 89135 Telephone: (702) 792-3773 Facsimile: (702) 792-9002 Email: swanise@gtlaw.com		
4			
5			
6	ELIZABETH C. HELM, ESQ.* *Admitted Pro Hac Vice NELSON MULLINS RILEY & SCARBOROUGH LLP Atlantic Station 201 17th Street, NW, Suite 1700 Atlanta, GA 30363		
7			
8			
9	Telephone: (404) 322-6000 kate.helm@nelsonmullins.com		
10	Counsel for Defendants		
11	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA		
12			
13			
14	MICHAEL EDGING,	Case No. 2:21-cv-00322-CDS-BNW	
15	Plaintiff,	JOINT NOTICE OF SETTLEMENT	
16	V.	AND STIPULATION AND ORDER REQUESTING STAY	
17	C. R. BARD, INC. and BARD		
18	PERIPHERAL VASCULAR, INC.,		
19	Defendants.		
20		·	
21	Plaintiff Michael Edging and Defend	lants C. R. Bard, Inc., and Bard Peripheral	
22	Vascular, Inc., pursuant to the Local Rules IA 6-1, 7-1, and 26-3 of Civil Procedure for		
23	the District of Nevada, are pleased to report that a settlement has been reached in the		
24	above-referenced case. Once all of the appropriate signatures have been obtained and		
25			
	settlement documents finalized, the parties will file an executed Stipulation of Dismissal		
26	of the entire action. In the meantime, the parties request that the Court stay this case and		
27	vacate all remaining deadlines as set forth in the Scheduling Order (Doc. 24) for 90 days.		
28	If Plaintiff has not filed dismissal papers wit	thin 90 days from the stay being granted, the	

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

parties request the opportunity to file a joint status report regarding the status of the settlement.

The Parties exchanged initial discovery consistent with the Court's Scheduling Order, including initial disclosures, executed records release authorizations, certain medical records, the Plaintiff Fact Sheet, and the Defendant Fact Sheet. All other case-specific fact and expert discovery has not been completed because of the settlement of this action. Accordingly, the parties request that the Court enter a stay of this case for 90 days pending Plaintiff's dismissal.

IT IS SO STIPULATED.

DATED this 26th day of May, 2022.

BERTRAM & GRAF, LLC

By: /s/ Benjamin A. Bertram (w/ permission) BENJAMIN A. BERTRAM, ESQ.* *Admitted Pro Hac Vice 2345 Grand Blvd., Suite 1925 Kansas City, MO 64108 Telephone: (816) 523-2205 Facsimile: (816) 523-8258 benbertram@bertramgraf.com

BRIAN D. NETTLES, ESQ. Nevada Bar No. 7462 NETTLES | MORRIS 1389 Galleria Drive, Suite 200 Henderson, Nevada 89014 Telephone: (702) 434-8282 Facsimile: (702) 434-1488 brian@nettlesmorris.com

GRANT L. DAVIS, ESQ.
SHAWN GAYLAND FOSTER, ESQ.
gdavis@dbjlaw.net
sfoster@dbjlaw.net
DAVIS BETHUNE JONES, LLC
City Center Square, Suite 2930
1100 Main Street
Kansas City MO 64105

Counsel for Plaintiff

NELSON MULLINS RILEY & SCARBOROUGH, LLP

/s/ Elizabeth C. Helm
ELIZABETH C. HELM, ESQ.*
*Admitted Pro Hac Vice
Atlantic Station
201 17th Street, NW / Suite 1700
Atlanta, GA 30363
Email: kate.helm@nelsonmullins.com

ERIC W. SWANIS, ESQ. (NSB 6840) GREENBERG TRAURIG, LLP 10845 Griffith Peak Drive, Suite 600 Las Vegas, Nevada 89135 Email: swanise@gtlaw.com

Counsel for Defendants

2728

1	ORDER	
2	If settlement is not reached pursuant to this stipulation, the parties must file	
3	a joint status report on or before August 26, 2022.	
4		
5	IT IS SO ORDERED:	
6	Dated this 26th day of May, 2022.	
7		
8	The Control of the Co	
9	Hon. Cristina D. Silva UNITED STATES DISTRICT JUDGE	
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		